

MORGAN & MORGAN, P.C.
Rachel A. Zelman, Esq. 10051
500 Ala Moana Boulevard, Suite 7-400
Honolulu, Hawai'i 96813
Telephone: (808) 466-6224
Email: rzelman@forthepeople.com

C. Ryan Morgan, Esq. (*Admitted Pro Hac Vice*)
Jolie N. Pavlos, Esq. (*Admitted Pro Hac Vice*)
Kimberly De Arcangelis (*Admitted Pro Hac Vice*)
Morgan & Morgan, P.A.
20 N. Orange Avenue, 15th Floor
P.O. Box 4979
Orlando, FL 32802-4979
Telephone: (407) 420-1414
Email: RMorgan@forthepeople.com
KimD@forthepeople.com
JPavlos@forthepeople.com

Counsel for the Plaintiff, SALU STATEN

KALAMA & FARM LLP
A Limited Liability Law Partnership
Linda Lee K. Farm 4514
lfarm@kalamafarm.com
Donna H. Kalama 6051
dkalama@kalamafarm.com
2700 South King Street #11187
Honolulu, Hawai'i 96828
Telephone: (808) 475-7680

FORDHARRISON, LLP
David Gobeo, Esq. (*Pro Hac Vice*)
Florida Bar No. 0016565
515 North Flagler Drive, Suite 350
West Palm Beach, FL 33401
(561) 345-7500 Telephone
Email: dgobeo@fordharrison.com
Attorneys for Defendant
POSITIVE BEHAVIOR SUPPORTS CORPORATION

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

SALU STATEN, on behalf of herself,
and others similarly situated,

Plaintiff,

vs.

POSITIVE BEHAVIOR SUPPORTS
CORPORATION,

Defendant.

CIVIL NO. 24-00435 MWJS-KJM

**STIPULATION FOR DISMISSAL
WITH PREJUDICE**

Judge: Hon. Micah W.J. Smith

Trial date: March 2, 2026

IT IS HEREBY STIPULATED by and between all parties who have appeared in this action, specifically Plaintiff SALU STATEN and Defendant POSITIVE BEHAVIOR SUPPORTS CORPORATION (collectively “the Parties”), by their respective counsel, that this action is dismissed with prejudice, the Parties to bear their own attorneys’ fees and costs.

There are no remaining parties and/or issues. All claims and parties are dismissed.

This stipulation is based on Rule 41(a) of the Federal Rules of Civil Procedure and Rule 41.1 of the Local Rules and has been signed by counsel for all parties who have made an appearance in this action.

WHEREAS:

1. Plaintiff Salu Staten (“Plaintiff”) asserted a collective action under 29 U.S.C. § 216(b) and a class action under Fed. R. Civ. P. 23 on her behalf and on behalf of all

similarly situated persons employed by Defendant Positive Behavior Supports Corporation (“Defendant”), arising from Defendant’s alleged violations of the Fair Labor Standards Act, 29 U.S.C. § 201 et seq., and the Hawai‘i Wage and Hour Law, Haw. Rev. Stat. §§ 387-1, et seq.

2. The Parties reached a full settlement on February 21, 2025. ECF No. 25. A status conference regarding the Parties’ settlement was held on March 3, 2025 (ECF No. 27) before The Honorable Kenneth J. Mansfield identifying a global settlement of all claims by and among the Parties, including, without limitation, all claims filed against Defendant by Plaintiff. The Parties executed the formal confidential settlement agreement on or about March 24, 2025.

3. The Parties filed their Joint Motion to Approve Confidential Settlement Agreement with the Court on April 30, 2025. ECF No. 28.

4. The Court rendered its Findings and Recommendations to Grant the Joint Motion to Approve Settlement on June 12, 2025. ECF No. 34.

5. Thereafter, the court rendered an Order Adopting Findings and Recommendation to Grant the Joint Motion to Approve Settlement on July 1, 2025. ECF No. 35.

6. Pursuant to the court’s July 1, 2025 Order Adopting Findings and Recommendation to Grant the Joint Motion to Approve Settlement (ECF No. 35) and the court’s subsequent Order directing the parties to file the stipulated dismissal

documents (ECF No. 36), the Parties hereby stipulate to the dismissal with prejudice of Defendant and the forgoing action upon approval by this court.

NOW, THEREFORE this action is dismissed with prejudice. The court retains jurisdiction to enforce the terms of the Parties' Confidential Settlement Agreement for 90 days from the date the court approves this Stipulation for Dismissal With Prejudice.

DATED: Honolulu, Hawai'i, July 16, 2025.

/s/ C. Ryan Morgan
RACHEL A. ZELMAN
C. RYAN MORGAN

Attorneys for Plaintiff
SALU STATEN

/s/ Linda Lee K. Farm
LINDA LEE K. FARM
DONNA H. KALAMA
DAVID GOBEO

Attorneys for Defendant
POSITIVE BEHAVIOR
SUPPORTS CORPORATION

APPROVED AS TO FORM:

DATED: Honolulu, Hawai'i, July 16, 2025.



/s/ Micah W.J. Smith

Micah W.J. Smith
United States District Judge

Salu Staten v. Positive Behavior Supports Corporation; Civil No. 24-00435 MWJS-KJM; STIPULATION FOR DISMISSAL WITH PREJUDICE